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March 11, 2008

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FILE NO.: 90300 1002  
REPLY TO: New York

**By Facsimile (973)648-7782 and Federal Express**

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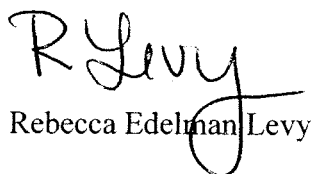
**Re: I/M/O Samuelle Klein-Von Reiche, Psy.D.**

Dear Ms. Krier:

Enclosed please find the Answer to the Administrative Complaint on behalf of Samuelle Klein-Von Reiche, Psy.D. ("Dr. Von Reiche") in the above referenced action. As we discussed, Dr. Von Reiche continues to remain interested in settling this matter to avoid having to go through the lengthy hearing process.

Thank you for your assistance with this matter.

Very truly yours,

  
Rebecca Edelman Levy

cc: Samuelle Klein-Von Reiche, Psy.D.  
Lourdes Martinez, Esq.

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FILED WITH THE BOARD OF  
PSYCHOLOGICAL EXAMINERS  
ON March 12, 2008

IN THE MATTER OF THE SUSPENSION :  
OR REVOCATION OF THE LICENSE OF :

**SAMUELLE KLEIN-  
VON REICHE, PSY.D.**  
License No. 35si00324600

TO PRACTICE PSYCHOLOGY :  
IN THE STATE OF NEW JERSEY :

STATE OF NEW JERSEY  
DEPARTMENT OF LAW AND PUBLIC  
SAFETY  
DIVISION OF CONSUMER AFFAIRS  
STATE BOARD OF PSYCHOLOGICAL  
EXAMINERS  
Docket No.

ADMINISTRATIVE ACTION

**ANSWER**

Samuelle Klein-Von Reiche, Psy.D. ("Respondent"), for her answer to Complainant,  
Attorney General of New Jersey's Complaint (the "Complaint"), filed February 4, 2008 responds as  
follows:

### **GENERAL ALLEGATIONS**

1. Neither admits nor denies the allegations of Paragraph 1 of the General Allegations of the Complaint as they constitute conclusions of law.
2. Neither admits nor denies the allegations of Paragraph 2 of the General Allegations of the Complaint as they constitute conclusions of law.
3. Admits the allegations of Paragraph 3 of the General Allegations of the Complaint.
4. Admits the allegations of Paragraph 4 of the General Allegations of the Complaint.
5. Admits the allegations of Paragraph 5 of the General Allegations of the Complaint.

## COUNT I

1. As to the allegations of Paragraph 1 of Count I of the Complaint, Respondent repeats and realleges as though fully set forth herein her answer to Paragraphs 1 through 5 of the General Allegations.

2. Admits the allegations of Paragraph 2 of Count I of the Complaint.

3. Denies the allegations of Paragraph 3 of Count I of the Complaint, but admits that Respondent addressed issues during therapy related to C.V.'s relationship with M.A.

4. Admits the allegations of Paragraph 4 of Count I of the Complaint.

5. Denies the allegations of Paragraph 5 of Count I of the Complaint.

5a. Denies the allegations of Paragraph 5(a) of Count I of the Complaint, but admits the following: (a) Respondent accompanied her client C.V. to a professional convention at the Atlantis Resort in the Bahamas; (b) Respondent traveled with C.V. to the convention on September 19, 2004; (c) Respondent and C.V. shared a hotel room at the Atlantis Resort in the Bahamas for two nights, on September 19 and 20, 2004; (d) Respondent did not pay the expenses of the hotel room and the airfare to the Bahamas as those expenses had been pre-paid; (e) While at the Atlantis Resort, Respondent and C.V. spent time together and dined together; (f) Respondent engaged in this conduct after she ceased treatment sessions with C.V.

5b. Neither admits nor denies the allegations of Paragraph 5b of Count I of the Complaint due to insufficient knowledge and recollection.

5c. Neither admits nor denies the allegations of Paragraph 5c of Count I of the Complaint due to insufficient knowledge and recollection.

5d. Neither admits nor denies the allegations of Paragraph 5d of Count I of the Complaint due to insufficient knowledge and recollection.

5e. Denies the allegations of Paragraph 5e of Count I of the Complaint, but admits that she revealed that she had separated from her husband when C.V. asked why she was no longer wearing her wedding ring.

6. Denies the allegations of Paragraph 6 of Count I of the Complaint.

6a. Denies the allegations of Paragraph 6a of Count I of the Complaint.

6b. Denies the allegations of Paragraph 6b of Count I of the Complaint.

6c. Denies the allegations of Paragraph 6c of Count I of the Complaint.

6d. Denies the allegations of Paragraph 6d of Count I of the Complaint.

## COUNT II

1. As to the allegations of Paragraph 1 of Count II of the Complaint, Respondent repeats and realleges as though fully set forth herein its answer to Count I.

2. Denies the allegations of Paragraph 2 of Count II of the Complaint.

2a. Denies the allegations of Paragraph 2a of Count II of the Complaint, but admits that C.V. discussed certain details of his relationship with M.A.

2b. Denies the allegations of Paragraph 2b of Count II of the Complaint, but admits that M.A. and C.V. discussed certain details of their relationship with Respondent.

2c. Admits the allegations contained in Paragraph 2c of Count II of the Complaint.

3. Denies the allegations contained in Paragraph 3 of Count II of the Complaint.

4. Denies the allegations contained in Paragraph 4 of Count II of the Complaint.

4a. Denies the allegations contained in Paragraph 4a of Count II of the Complaint but

admits that during the course of therapy Respondent had discussions with C.V. regarding the future of his relationship with M.A.

4b. Denies the allegations contained in Paragraph 4b of Count II of the Complaint but admits that Respondent informed C.V. that she was separated from her husband when asked by C.V. why she was no longer wearing her wedding ring.

4c. Denies the allegations contained in Paragraph 4c of Count II of the Complaint but admits that Respondent learned, after the termination of therapy, that M.A. would not accompany C.V. to his professional convention and knew that C.V. was reluctant to attend the conference alone; Respondent admits to accompanying C.V. to the convention in the Bahamas after the termination of C.V.'s treatment.

4d. Denies the allegations contained in Paragraph 4d of Count II of the Complaint, but neither admits nor denies that she dined or had coffee with C.V. due to insufficient knowledge and recollection.

5. Neither admits nor denies the allegations in Paragraph 5 of Count II of the Complaint due to insufficient knowledge.

6. Denies the allegations of Paragraph 6 of Count II of the Complaint, but admits that she telephoned C.V. and discussed M.A.'s complaint to the Board.

7. Denies the allegations of Paragraph 7 of Count II of the Complaint.

7a. Denies the allegations of Paragraph 7a of Count II of the Complaint.

7b. Denies the allegations of Paragraph 7b of Count II of the Complaint.

7c. Denies the allegations of Paragraph 7c of Count II of the Complaint.

7d. Denies the allegations of Paragraph 7d of Count II of the Complaint.

- 7e. Denies the allegations of Paragraph 7e of Count II of the Complaint.

### COUNT III

1. As to the allegations of Paragraph 1 of Count III of the Complaint, Respondent repeats and realleges as though fully set forth herein its answer to Count I and Count II.

2. Admits the allegations of Paragraph 2 of Count III of the Complaint.

3. Neither admits nor denies the allegations of Paragraph 3 of Count III of the Complaint due to insufficient knowledge.

4. Admits the allegations of Paragraph 4 of Count III of the Complaint.

4a. Admits the allegations of Paragraph 4a of Count III of the Complaint.

4b. Denies the allegations of Paragraph 4b of Count III of the Complaint.

5. Denies the allegations of Paragraph 5 of Count III of the Complaint but admits that certain statements made in Respondent's letter of January 31, 2005 were false.

5a. Denies the allegations of Paragraph 5(a) of Count III of the Complaint, but admits the following (a) Respondent accompanied her client C.V. to a professional convention at the Atlantis Resort in the Bahamas; (b) Respondent traveled with C.V. to the convention on September 19, 2004; (c) Respondent and C.V. shared a hotel room at the Atlantis Resort in the Bahamas for two nights, on September 19 and 20, 2004; (d) Respondent did not pay the expenses of the hotel room and the airfare to the Bahamas as those expenses had been pre-paid; (e) While at the Atlantis Resort, Respondent and C.V. spent time together and dined together.

5b. Denies the allegations contained in Paragraph 5b of Count III of the Complaint, but neither admits nor denies that Respondent met C.V. at a diner for coffee due to insufficient knowledge and recollection.

5c. Neither admits nor denies that she dined with C.V. in New Jersey on two occasions due to insufficient knowledge and recollection.

5d. Neither admits nor denies the allegations of Paragraph 5d of Count III of the Complaint due to insufficient knowledge and recollection.

6. Denies the allegations of Paragraph 6 of Count III of the Complaint, but admits that she revealed that she had separated from her husband when C.V. asked why she was no longer wearing her wedding ring.

7. Denies the allegations of Paragraph 7 of Count III of the Complaint.

7a. Denies the allegations of Paragraph 7 of Count III of the Complaint.

7b. Denies the allegations of Paragraph 7 of Count III of the Complaint.

7c. Denies the allegations of Paragraph 7 of Count III of the Complaint.

7d. Denies the allegations of Paragraph 7 of Count III of the Complaint.

#### **FIRST AFFIRMATIVE DEFENSE**

Respondent did not commit professional misconduct as defined at N.J.S.A. 45:1-21.

#### **SECOND AFFIRMATIVE DEFENSE**

The Complainant's claims are barred by the equitable doctrines of laches, estoppel and waiver.

#### **THIRD AFFIRMATIVE DEFENSE**

The Complaint contains insufficient information to permit Respondent to raise all appropriate defenses and Respondent therefore specifically reserves her right to amend and/or supplement this Answer with additional and appropriate defenses.

**WHEREFORE**, Respondent demands judgment against the Complainant, dismissing the Complaint in its entirety.

**GARFUNKEL, WILD & TRAVIS, P.C.**  
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